

NACM Southeast is a member owned non-profit association representing over 600 Business Credit professionals. As a small association, the proposed rules will put an additional financial as well as administrative burden on our already tight budget.

Our members rely on the exchange of information between each company as well as through the association due to the nature of our business. (Commercial Credit Transactions). The majority of this exchange is still via fax. Although we have invested heavily in technology and continue to do so, the nature of our business is very paper oriented. We request more dialogue and definitions on this issue, we suggest the "established business relationship" understanding be included in the ruling.

Thank you for allowing us the opportunity to respond.